

1 Kate Mueting, DC Bar No. 988177\*  
2 Dacey Romberg, DC Bar No. 90003767\*  
3 Samone Ijoma, MD Bar No. 2012170086\*  
4 **SANFORD HEISLER SHARP, LLP**  
5 700 Pennsylvania Avenue SE, Suite 300  
6 Washington, DC 20003  
7 Telephone: (202) 499-5206  
8 kmueting@sanfordheisler.com  
9 dromberg@sanfordheisler.com  
10 sijoma@sanfordheisler.com

11 Charles Field, SBN 189817  
12 **SANFORD HEISLER SHARP, LLP**  
13 7911 Herschel Avenue, Suite 300  
14 La Jolla, CA 92037  
15 Telephone: (619) 577-4252  
16 cfield@sanfordheisler.com

17 Kristi Stahnke McGregor, GA Bar No. 674012\*  
18 **SANFORD HEISLER SHARP, LLP**  
19 611 Commerce Street, Suite 3100  
20 Nashville, TN 37203  
21 Telephone: (615) 434-7008  
22 kmcgregor@sanfordheisler.com

23 Christopher Owens, MD Bar No. 220280004\*  
24 **SANFORD HEISLER SHARP, LLP**  
25 111 S. Calvert Street, Suite 1950  
26 Baltimore, Maryland 21202  
27 Telephone: (410) 834-7422  
28 cowens@sanfordheisler.com

*Attorneys for Plaintiffs  
and the Potential Class*

\* admitted *pro hac vice*

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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NORTHERN CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 COURTNEY MCMILLIAN and RONALD  
12 COOPER, on behalf of themselves and all others  
similarly situated,

13 Plaintiffs,

14 v.  
15

16 X CORP., f/k/a/ TWITTER, INC.,  
17 X HOLDINGS, ELON MUSK, DOES,

18 Defendants.

Case No. 3:23-cv-03461-TLT-RMI

**DECLARATION OF  
DACEY ROMBERG**

Judge: Trina L. Thompson  
Magistrate Judge: Robert M. Illman

19  
20 **DECLARATION OF DACEY ROMBERG**

21 I, Dacey Romberg, declare as follows:

- 22 1. I am an attorney licensed to practice law in the District of Columbia and am employed by  
23 the law firm Sanford Heisler Sharp, LLP. I am an attorney of record for the Plaintiffs in  
24 the above-captioned case.
- 25 2. I emailed Defendants' counsel on April 25, 2024, indicating that Defendants' "Rule 7.1  
26 Corporate Disclosure Statement and Civil L.R. 3-15 Certification of Conflicts and  
27 Interested Entities or Persons" (Dkt. 55) did not comply with Civil Local Rule 3-15(b)(2)  
28

Case No. 3:23-cv-03461-TLT-RMI

**DECLARATION OF DACEY ROMBERG**

1 because it failed to list the owners of Defendant X Holdings Corp.

2 3. I followed up with Defendants' counsel on April 30, 2024.

3 4. Defendants' counsel responded that Defendants would not be filing a compliant  
4 certification.

5 5. On May 1, 2024, I emailed Defendants' counsel the order from *Anoke v. Twitter*, No. 23-  
6 2217, Dkt. 35 (N.D. Cal. June 6, 2023), requiring Twitter defendants to identify the owners  
7 of X Holdings Corp. to comply with Local Rule 3-15. Defendants' counsel did not respond.  
8

9 6. I emailed Defendants' counsel again on May 6, 2024, but they did not respond.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing  
11 is true and correct. Executed this 6th day of May 2024 in Washington D.C.

12  
13 DATED: May 6, 2024

By: /s/ Dacey Romberg

14 Dacey Romberg, DC Bar 90003767  
15 (admitted *pro hac vice*)  
16 **SANFORD HEISLER SHARP, LLP**  
17 700 Pennsylvania Avenue SE, Suite 300  
18 Washington, DC 20003  
Telephone: (202) 499-5206  
dromberg@sanfordheisler.com

19 *Attorney for Plaintiffs*  
20 *and the Potential Class*